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July 26, 2017

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al
16-cr-0371-4 (RA)

Dear Judge Abrams:

We represent Bevan Cooney, one of the defendants in above-referenced case. We write to join, so far as applicable to defendant Bevan Cooney, the Emergency Letter Motion made by counsel representing Devon Archer on July 26, 2017 (Dkt. 191). Upon information and belief we believe that the Government just as in the case of Mr. Archer, has similarly produced to all defendants in this case the entire contents of Mr. Cooney's e-mail account, save certain documents that the government has segregated for privilege review. Based on the correspondence Mr. Archer's attorney has filed in connection with his motion, the Government has acknowledged in their email with Mr. Archer's attorney, that they have treated all five email accounts which includes Mr. Cooney's e-mail account in the same manner. Counsel for Mr. Cooney during the past week received a copy of the most recent discovery production on a hard drive which we have not yet had the opportunity to review.

Given the Court's Order late this evening, we hereby notify the Court and the Government that we intend to join Mr. Archer's emergency motion shortly and ask that the Court Order all defendant and their counsel (other than Mr. Cooney and his counsel) shall refrain from accessing and reviewing, or disclosing any materials that were produced by the Government and that come from email accounts associated with Mr. Cooney. Thank you for your consideration.

Respectfully submitted,

/S/
Paula J. Notari
Abraham Hassen
Attorneys for Bevan Cooney

cc: (via ECF & email) AUSAs Brian Blais, Rebecca Mermelstein, Aimee Hector and Andrea Griswold